



EPSTEIN DRANGEL LLP

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September 1, 2022

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

VERNON S. BRODERICK

U.S.D.J. 09/02/2022

***Re: Foxmind Canada Enterprises Ltd. v. Changsha Fushend Trading Co.,
Ltd., et al.,
Civil Case No. 22-cv-885 (VSB)
Request for Extension of Time to File Supplemental Submission***

Dear Judge Broderick,

We represent Plaintiff Foxmind Canada Enterprises Ltd., (“Plaintiff”), in the above-referenced matter (the “Action”).¹ On August 25, 2022, the Court directed Plaintiff to file a supplemental declaration by no later than September 7, 2022 (“Supplemental Declaration”). For the reasons set forth herein, Plaintiff respectfully requests a two-week extension to file the Supplemental Declaration, until September 21, 2022.

In accordance with Your Honor’s Individual Practices, Plaintiff respectfully submits the following:

1. **Original date:** September 7, 2022;
2. **Number of previous requests for extension of time:** None, this is Plaintiff’s first request for an extension of time to file its Supplemental Declaration;
3. **Whether these previous requests were granted or denied:** N/A;
4. **Whether the adversary consents:** None of the Defendants have appeared in this Action and thus Plaintiff did not seek their consent; and
5. **The specific reasons for an extension of time:** The reason for Plaintiff’s request for an extension of time is that in light of the holidays in both China and the U.S., Epstein Drangel needs additional time to correspond with its Beijing office regarding its investigation of Defendants’ addresses and gather the relevant information requested by the Court.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

Hon. Vernon S. Broderick
September 1, 2022
Page 2

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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